REMARKS

This communication is in response to the Office Action mailed on October 28, 2005. Before addressing the substantive rejections, applicants respectfully request that the specification be amended to correct a reference number error with respect to FIG. 7. In addition, applicants request approval of the drawing correction to FIG. 7 to include reference numbers "300A" and "300B" and corresponding blocks for libraries as found in the specification at page 29, line 29 – page 30, line 24.

The Office Action reports that claims 1-46 and 52-56 were rejected under 35 U.S.C. §102(a) as being anticipated by Ladd et al. (US Patent 6,269,336). Of these claims, claims 1, 12, 23 and 52 are independent claims.

The Examiner has rejected claims 1, 12 and 23 in a single rejection providing citations to Ladd et al. With this amendment, each of these claims have been amended to clarify the patentable inventions recited therein with respect to Ladd et al. as well as address the responses made to the applicant's last communication.

Referring first to the second point raised in the "Response to Arguments" wherein it was reported that applicants have not recited a server side plug-in module, applicants have amended each of claims 1, 12 and 23 to positively recite a module that is configured to generate client side markup.

On page 6, the Office Action reports that there is little difference between the second set of controls "using" at least one of the first controls and where the second set of controls is selectively "associated" with the first set of controls. With this amendment, the patentable differences

between claim 12 (embodiment of FIG. 8) and claim 23 (embodiment of FIG. 9) have been clarified. As amended, claim 12 recites there are two types of controls, a first set of controls for defining visual rendering and a second set of controls for defining at least one of recognition and audible prompting. As further recited by claim 12, the module is configured to receive an authoring page having the first set of controls and the second set of controls and is configured to generate client side markup by processing the controls. In addition, it is recited in claim 12 that "the module is configured to use at least one of the first set of controls in order to generate markup when processing each of the second set of controls." (Emphasis added) In contrast, claim 23 also recites first and second controls, but in addition, the module generates client side markup for each control of the set of controls separately. Accordingly, it is respectfully submitted claims 12 and 23 recite separate inventions.

The third point raised in the "Response to Argument" concerns the substance of the rejection where the Office Action appears to report that the HTML standard meets the first set of claims (visual rendering), while use of a voice browser implies use of a markup suited for recognition or audible prompting. Each of claims 1, 12 and 23 have been amended to clarify that the first and second sets of controls are not capable of being implemented on a client browser such as in the case of Ladd et al., but rather that the controls are used to generate markup as discussed above. For the reasons stated in the last response, Ladd et al. merely describes a voice browser for interactive services and methods thereof. The system illustrated and described provides a number of communication devices 201, 202, 203 and 204 that can access information. Ladd et al. do mention a markup language server 251 or a markup language server 257; however, no where do Ladd et al. describe controls of the type recited in independent claim 1 and for that matter independent claims 12 and 23. At best Ladd et al.

provide a general description of the markup language servers, but provide no details as to any sort of controls which would be used in the manner as recited by claim 1. Accordingly, applicants respectfully request withdrawal of the rejection and allowance of claim 1.

In view of the foregoing, applicant respectfully requests withdrawal of the rejection of claims 1, 12 and 23. The dependent claims depend directly or indirectly from these independent claims and recite further features that when combined with the independent claims, or any intervening claims, are believed separately patentable because Ladd et al. simply do not go into the detail recited by these claims.

With respect to independent claims 52, this claim recites a computer implemented method for defining a web site application on a server in a server/client architecture. The method includes defining the web site application with a first set of visual controls and a second set of controls related to at least one of recognition and audible prompting. The method further includes a step of processing with language similar to that used in independent claim 23, and thus, for the reasons discussed above, which are hereby incorporated by reference, applicants respectfully submit that Ladd et al. do not teach or suggest the invention recited by claim 52. Withdrawal of the rejection to claim 52 is respectfully requested. Dependent claims 53-56 recite further features that when combined with claim 52 and any intervening claims are also separately patentable.

Submitted herewith is a Request for Continuing Examination and an Information Disclosure Statement citing additional references.
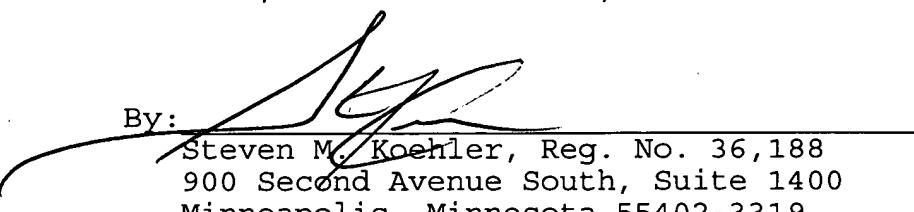
Applicant hereby requests an extension of time to respond to the Office Action. A charge authorization for the extension of time fee and extra claim charges is enclosed.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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